# **COMMENT SET 1**

635 SOUTH HIGHWAY 101 • SOLANA BEACH, CA 92075-2215 • (858) 720-2400 • FAX (858) 755-1782

April 17, 2001

Mr. Kirk Walker California State Lands Commission 100 Howe Avenue, Suite 100 South Sacramento, CA 95805-8202

RE: Comments on the Notice of Preparation for the Proposed Agua Hedionda Lagoon North Jetty Restoration Project

Dear Mr. Walker:

Thank you very much for the opportunity to comment on the proposed preparation of the Agua Hedionda Jetty Project Environmental Impact Report (EIR). We strongly encourage the EIR to thoroughly address sand movement along the coast with and without the project, as well as including appropriate mitigation measures for potential down coast impacts.

We appreciate your upfront identification of this and related sand issues in the Notice of Completion and look forward to reviewing the EIR. Upon its availability for public review, we would appreciate receiving three copies of the EIR.

Most Sincerely.

Steven A. Apple

Community Development Director

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cc: City Manager Robert Semple Mayor Thomas Campbell Deputy Mayor Marcia Smerican Councilmember Thomas Golich Councilmember Joe Kellejian Councilmember Douglas Sheres

APR 1 9 2001

### **RESPONSE TO COMMENT SET 1**

1.1 The EIR thoroughly addresses sand movement along the coast and includes mitigation measures for potential down coast impacts. The sections on Biology (pages 4.1-1 through 4.1-45), Hydrology and Water Quality (pages 4.2-1 through 4.2-21), Aesthetics/Visual Resources (pages 4.3-1 through 4.3-6), and Recreation (pages 4.4-1 through 4.4-14) all contain evaluations of the effects of the proposed Project on sand movement, the resulting impacts down coast, and mitigation measures designed to reduce the identified impacts.

# **COMMENT SET 2**



April 26, 2001

401 B Street, Suite 800 San Diego, CA 92101-4231 (619) 595-5300 - Fax (619) 595-5305 www.sandag.cog.ca.us

Mr. Kirk Walker California State Lands Commission 100 Howe Avenue, Suite 100-South Sacramento, CA 95825-8202

RE: Notice of Preparation for an Environmental Impact Report/Environmental Assessment Agua Hedionda Lagoon Northern Inlet Jetty Extension

#### Dear Mr. Walker:

The San Diego Association of Governments (SANDAG) appreciates the opportunity to provide input into the preparation of the draft environmental impact report/environmental assessment for the Northern Inlet Jetty Extension Project at Agua Hedionda Lagoon. The description of the jetty extension erroneously states that the project is proposed as a "mitigation measure intended to address expected cumulative increases in sedimentation/shoaling impacts to Agua Hedionda Lagoon associated with...implementation of the SANDAG Regional Beach Sand Project in Spring 2001." It should be noted that SANDAG was required to provide funding to Cabrillo Power to mitigate impacts associated with sedimentation at Agua Hedionda Lagoon. The funds will be used to offset the costs of dredging the additional sediment associated with the project. After the dredging is completed, the impacts associated with the Regional Beach Sand Project will be mitigated. In addition, it is anticipated that the impacts from the Regional Beach Sand Project will almost entirely occur in the first two years after the project is built. A permanent jetty extension that would not be built in time to affect change in sedimentation associated with SANDAG's project will not mitigate impacts from the project. If such a measure is being proposed as "mitigation" for the Regional Beach Sand Project, it would need to be in place now, not sometime in the future. However, SANDAG is responsible for mitigating impacts associated with the Regional Beach Sand Project which includes payment to Cabrillo Power for additional dredging in the lagoon.

We would also like to point out that the power plant operations in the lagoon have significantly altered the flow of water in the lagoon by making it flood-tide dominant and most likely increase the rate of shoaling in the lagoon from the littoral zone. The water intake at the power plant for cooling and the creation of an artificial outlet for the cooling water are the cause of this situation. A more correct characterization of the jetty extension would be as mitigation for this effect.

MEMBER AGENCIES: Cities of Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Encinitas, Escorda, Imperial Béach, La Mesa, Lemon Grove,
National City, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, Vista, and County of San Diego.
ADVISORY/LIAISON MEMBERS: California Department of Transportation, Metropolitan Transit Development Board, North San Diego County Transit Development Board,
U.S. Department of Delense, S.D. Unified Port District, S.D. County Water Authority, and Tijuana/Baja California/Mexico.

We look forward to the opportunity to review the draft environmental impact report/environmental assessment when it is available for public comment. If you have any questions regarding SANDAG's comments, please contact me at (619) 595-5649.

Sincerely,

**ROB RUNDLE** 

Senior Regional Planner

#### **RESPONSE TO COMMENT SET 2**

- 2.1 The description of the proposed Project as "mitigation" was provided by the Applicant and represents the Applicant's opinion regarding the need for the Project. The analyses contained in the EIR do not consider the proposed Project to be mitigation for the SANDAG Regional Beach Sand Project.
- 2.2 The comment is correct that the proposed Project was not constructed in time to change sedimentation associated with the SANDAG Regional Beach Sand Project. The analyses contained in the EIR do not consider the proposed Project to be mitigation for the SANDAG Regional Beach Sand Project.
- 2.3 Yes, the operation of the Encina Generating Station is the most important reason for the relatively high rates of sedimentation within Agua Hedionda Lagoon. Shoaling is a natural phenomenon in southern California lagoons, but the intake of cooling water by the Encina Generating Station makes the lagoon a flood-time dominated system, which greatly increases sand entrainment, sedimentation, and shoaling.